REMARKS

Reconsideration of the application is respectfully requested. Claims 2-13 and 15-23 were objected to due to informalities. The claims have now been corrected and should be in full conformance. Claims 5 and 15 were objected to due to acronyms. Claims 5 and 15 have now been corrected and should also be in full conformance. No new information has been added to the claims. Support may, for example, be found on page 8, lines 8-29, page 9, lines 5 to page 11, line 6.

Claims 5 and 7 were objected to under Section 112 for providing insufficient antecedent basis. Claims 5 and 7 have now been amended and should fully conform to the requirements of Section 112.

Claims 1, 5, 8, 11 and 23 were rejected under Section 101 as claiming the same invention as that of claims 1, 3-4, 10-11 of prior US 2007/0004455 (the '455 application), now Patent No. 7,505,786. This rejection is respectfully traversed.

Claim 1 has now been amended so that same identical subject matter is not claimed compared to the claims of the '455 application. For example, the '455 application does not claim the steps of switching on the terminal part of the mobile station to connect the mobile station to the network, the application in the module of the mobile station comparing the detected device information to device information previously stored in the module of the mobile station, the application in the module of the mobile station sending the detected device information to the detector to be stored in the network repository when the detected device information does not correspond to the device information previously stored in the module, the detector updating the network repository with the detected device information, and the detector obtaining updated information from the network

repository associated with the detected device information and sending the updated information to the module to update the module with the updated information. Therefore, the amended claim 1 is not claiming the same identical subject matter as claim 1 of the '455 application and the double patenting rejection under Section 101 should be withdrawn.

A terminal disclaimer is hereby submitted to obviate any double patenting in view of the '455 application (now US patent no. 7,505,786) under sections other than section 101.

Claims 5, 8 and 11 depend upon the allowable base claim 1 and includes limitations not taught or suggested in the cited references and should therefore be allowable.

Regarding claim 23, Applicants are puzzled over the Section 101 double patenting rejection since claim 23 depend upon claim 20 that depends upon claim 16 that depends upon claim 14. The inclusion of claim 23 in the double patenting rejection under Section 101 may have been a mistake. In the alternative, it is submitted that the Examiner has not met his burden of showing the same invention is claimed since the Examiner only compares claim 23 to claim 10 of the '455 application without considering the different claim dependency (i.e. claims 20, 16 and 14). It is respectfully requested that the rejection of claim 23 under Section 101 double patenting should be withdrawn. In the alternative, the Examiner is respectfully requested to show how all the same limitations of the combination of the current claims 23, 20, 16 and 14 are also claimed in the '455 application.

Claims 1-3, 5-9, 14-20, 22-23 were rejected under Section 102 as being anticipated by Pecen. This rejection is respectfully traversed.

An important feature of the present invention is to effectively manage a mobile station when the user either changes the mobile terminal or changes the SIM card in the mobile device so that the mobile station can be effectively updated with personal and other previously stored information.

An application in the mobile station detects when a new device (such as a new SIM card or a new mobile terminal is used by the user. The detected device information is sent to a detector that updates a network repository and obtains updated information that is sent to the mobile station to update the mobile station with the updated information.

Pecen merely teaches a method and apparatus for anonymous network access when the SIM card of the mobile telephone is absent or the user is otherwise unauthorized to access the network. This is quite different from the problems solved by the present invention. When the SIM is absent, Pecen generates an interim international mobile subscriber entity (IMSI) so that the user can get through anyway (see paragraphs 0011-0012). Pecen's mobile device 102 has an interim identity generator 138 for generating the interim IMSI and a SIM detector 140 for detecting the presence of the SIM card 142 (see paragraph 0030). When the SIM card is absent or when access is prohibited the generator 138 generates the interim IMSI (see paragraph 0032).

Nowhere does Pecen or any other cited reference teach or suggest the step of the application in the module comparing the detected device information to device information previously stored in the module of the mobile station. For example, Pecen does not compare information detected from Pecen's SIM card 142 with information stored in the memory 144. Consequently, Pecen also fails to teach the step of the application in the module sending the detected device information to the detector to be stored in the network repository when the detected device information does not correspond to the device information previously stored in the module. In contrast, Pecen merely generates an interim IMSI when the SIM card is either absent or access is barred. The generation of the IMSI has, for example, nothing to do with what has been stored in Pecen's memory 144.

The Examiner refers to paragraphs 0031 and 0040 to

show the "comparing" step. Applicants respectfully submit that the cited two paragraphs do not show the comparing step as required by the amended claim 1. In paragraph 0031, Pecen's SIM detector 140 merely detects the presence of the SIM card 142 and informs the SIM generator 138 when the SIM card 142 is not positioned within the mobile device 102. In paragraph 0040, Pecen's support node 112 directs the interim IMSI 200 to the user identity module 154 that routes the interim MNC 202 and interim MCC 204 of the interim IMSI 200 to the interim HLR 156 that computes and transmits the authentication response triplet to the mobile device 102 that correspond to the access networks 104 and 128 so that the mobile device 102 can gain access to the networks 104, 128.

Applicants submit that Pecen and the other cited references completely fail to teach or suggest the step of the application in the module comparing the detected device information to the device information previously stored in the module of the mobile station. Additionally, Pecen and the other cited references fail to teach or suggest the step of the application in the module sending the detected device information to the network detector when the detected device information does not correspond to the device information previously stored in the module.

The Examiner refers to paragraph 0040 of Pecen as teaching the step of the application in the module of the mobile station sending the detected device information to the detector to be stored in the network repository when the detected device information does not correspond to the device information previously stored in the module. Applicants respectfully disagree. The Examiner also states the example, "if service is not barred, a normal SIM-based call would be routed to HLR 150." It is correct that a normal SIM-based call is routed to HLR 150 when the SIM card 142 is present and the interim IMSI would be used when the SIM card 142 is not present or barred. However, this is not what the amended

claim 1 requires. As stated above, claim 1 requires that a comparison is made between the detected device information and the device information previously stored in the module, and that the application in the module sends the detected device information when the detected device information does not correspond to the device information previously stored in the module. Applicants fails to see where and how Pecen is showing these features by referring to the steps of sending a normal SIM based call when the SIM card 142 is present and using the interim IMSI when the SIM card is not present. It is respectfully submitted that the teaching in paragraph 0040 is completely different from the requirements of the amended claim 1.

Additionally, claim 1 requires the step of the detector updating the network repository with the detected device information. It is submitted that Pecen completely fails to teach or suggest this step also. For example, the detection of the absent SIM card 142 is not stored in HLR 150. Finally, Pecen and the other cited references also completely fail to teach or suggest the step of the detector obtaining updated information from the network repository associated with the detected device information and sending the updated information to the module to update the module with the updated information.

In view of the above, it is submitted that the amended claim 1 is allowable.

Claims 2-3, 5-9 are submitted to be allowable because they depend upon the allowable base claim 1 and because each claim includes limitations that are not taught or suggested in the cited references.

Claim 14 is submitted to be allowable for reasons similar to the reasons put forth for the allowability of the amended claim 1. More particularly, the amended claim 14 is submitted to be allowable because the cited references fail to teach or suggest the application of the module having means

for comparing detected device information with device information previously stored in the module and having means for sending the detected device information to the detector when the detected device information differs from the previously stored device information in the module. The cited references also fail to teach or suggest the detector having means for receiving the detected device information from the application and updating the device information in the repository, and the detector having means for obtaining updated information associated with the detected device information from the repository and sending the updated information to the application in the module to update the device information stored in the module.

Claims 15-20, 22-23 are submitted to be allowable because they depend upon the allowable base claim 14 and because each claim includes limitations that are not taught or suggested in the cited references.

Claims 4, 10 and 12-13 were rejected under Section 103 as being obvious over Pecen in view of Zhao. This rejection is respectfully traversed.

Claims 4, 10 and 12-13 are submitted to be allowable because they depend upon the allowable base claim 1 and because each claim includes limitations that are not taught or suggested in the cited references.

Claims 11 and 21 were rejected under Section 103 as being obvious over Pecen in view of Kjellman. This rejection is respectfully traversed.

Claims 11 and 21 are submitted to be allowable because they depend upon the allowable base claims 1 and 14, respectfully, and because each claim includes limitations that are not taught or suggested in the cited references.

The application is submitted to be in condition for allowance, and such action is respectfully requested.

Respectfully submitted,

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